

DOUBLED B.V.
166107

PLAYER COMPLAINTS POLICY



09/07/2025

17, Chuchubiweg, Willemstad, Curacao

1. Policy Overview

This Player Complaints Policy (“Policy”) has been formally established and published by DOUBLED B.V., a private limited liability company incorporated under the laws of Curaçao, registered with company number 166107, and holding the license issued by the Curaçao Gaming Control Board, license number OGL/2024/1015/0870.

This Policy has been designed to provide a structured and comprehensive framework for the receipt, handling, and resolution of Complaints submitted by Players. It reflects DOUBLED B.V.’s unwavering commitment to maintaining the highest standards of fairness, transparency, and player protection. The company’s practices align fully with the obligations set forth in Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de Kansspelen, LOK) and adhere to the supervisory guidelines issued by the Curaçao Gaming Authority (CGA).

The primary aim of this Policy is to ensure that all Players have access to a clear, efficient, and impartial complaints resolution mechanism. It establishes processes that guarantee player concerns are handled promptly and equitably. Moreover, this Policy confirms the Player’s right to escalate any unresolved Complaint to independent and cost-free Alternative Dispute Resolution (ADR) services, in full compliance with Curaçao’s regulatory framework.

This Policy is binding on all Players from the moment they register an account and use the gaming services provided by DOUBLED B.V.. By completing registration—whether through explicit acknowledgment such as ticking a checkbox or accepting a pop-up notification—or by continued engagement with the company’s services, Players are deemed to have accepted the terms of this Policy.

The provisions herein are intended to complement and operate in harmony with all applicable private law obligations, including but not limited to those set forth in Book 6 of the Civil Code of Curaçao concerning general terms and conditions. Nothing within this Policy shall be interpreted as limiting or overriding a Player’s rights under applicable civil law.

2. Complaint Submission

2.1 Timeframe for Submitting Complaints

Players of DOUBLED B.V. may submit a Complaint within six calendar months from the date a bet was settled, the occurrence of the incident in question, or the conclusion of the gaming event to which the Complaint relates. This timeframe applies equally to all gaming services provided by the company, including peer-to-peer games such as poker, ante-post fixed odds betting, and in-play sports markets.

In the case of in-play betting markets, where outcomes and decisions often rely on rapidly changing data, Players are strongly encouraged to raise their Complaints at the earliest opportunity. Certain data relevant to these markets may not remain accessible indefinitely due to its dynamic nature. Therefore, the company cannot reasonably be expected to retain such information beyond the normal data retention practices already in place.

2.2 Procedure for Submitting Complaints

Only registered Players are permitted to submit a Complaint to ensure fairness and consistency throughout the process. Players must use the official Complaint Submission Form provided by DOUBLED B.V., which is available in two formats:

- A downloadable PDF or Word document accessible via the company's website that can be completed and returned by email (or)
- An online interactive form that can be filled out and submitted directly through the Player's account dashboard on the platform.

The form requires Players to provide the following essential details:

1. Full legal name, residential address, and Player account identifier where applicable.
2. The date of submitting the Complaint along with the date of the event or decision that led to it.
3. A clear description of the issue supported by relevant documents or evidence whenever possible.
4. The category of Complaint selected from a predefined list, such as deposit issues, withdrawal concerns, technical malfunctions, or Responsible Gaming matters.

Players should also be aware that DOUBLED B.V. may request additional information or documentation if it is reasonably necessary to conduct a full and fair investigation. Any such requests will be proportionate to the nature and complexity of the Complaint.

2.3 Role of the Curaçao Gaming Authority (CGA)

It is important for Players to understand that the Curaçao Gaming Authority (CGA) does not intervene in the resolution of individual disputes between Players and operators. The CGA functions in a supervisory capacity, using aggregated Complaint data to monitor licensee compliance and to support its regulatory enforcement actions when required.

However, Players retain the right to contact the CGA directly if they believe that DOUBLED B.V. has engaged in conduct that breaches its licensing obligations or Curaçao's regulatory framework. The company will not impose any restrictions on a Player's ability to report such concerns to the regulator.

3. Resolution Process

3.1 Prioritisation

All Complaints received by DOUBLED B.V. are recorded systematically and reviewed to assess their priority. Complaints that involve Responsible Gaming issues, including but not limited to failures in applying self-exclusion measures or concerns about the targeting of vulnerable players, are given priority due to their potential impact on player well-being.

For such Responsible Gaming Complaints, the company strives to provide a final response within five business days. In exceptional circumstances, where the complexity of the matter or external factors require more time, this period may be extended by no more than two additional weeks.

Other categories of Complaints are processed in the order they are received. The target resolution period for these is four weeks. If additional time is necessary due to the complexity or evidentiary requirements of a particular case, the company may extend the period once by up to four more weeks, with prior notification provided to the Player.

3.2 Confirmation of Receipt

When a Complaint is received, DOUBLED B.V. provides a formal acknowledgment in writing within the following timeframes:

- Within two calendar days for Complaints relating to Responsible Gaming issues.
- Within seven calendar days for all other types of Complaints.

This acknowledgment will include:

1. Confirmation that the Complaint has been received and the assignment of a unique reference number for tracking purposes.
2. A clear outline of the steps that will be taken during the investigation and resolution process.
3. Information about the expected timeframe for resolution, including any potential for extensions and the reasons they may be required.

3.3 Investigation and Resolution

Each Complaint is investigated thoroughly and with impartiality. The investigation process includes:

- A review of relevant account information, transaction logs, system records, and communication history.
- Collaboration with internal departments such as Customer Support, Compliance, and Technical Operations to ensure all aspects of the Complaint are fully understood.
- Requests for additional information or documentation from the Player if this is necessary to resolve the matter.

The designated Complaint Handler ensures that the investigation is conducted diligently and transparently. Upon completion, the Player will receive:

1. A detailed written explanation of the outcome, supported by relevant evidence where applicable.
2. Clear guidance on the Player's right to escalate the matter to an Alternative Dispute Resolution (ADR) provider if they remain dissatisfied.
3. Contact details for the ADR provider(s) engaged by DOUBLED B.V..

3.4 Artificial Intelligence

DOUBLED B.V. may use artificial intelligence tools to support certain aspects of the Complaint management process, such as sorting cases or identifying patterns. However, human oversight is mandatory in specific instances, including:

- Complaints that involve Responsible Gaming issues.
- Complaints considered complex or those that include sensitive personal or financial information.

Any resolution that involves AI assistance is carefully reviewed to ensure that the outcome is fair, accurate, and consistent with regulatory requirements and the protection of Player rights.

4. Alternative Dispute Resolution (ADR)

4.1 ADR Services

If a Player remains dissatisfied after completing the internal complaints procedure of DOUBLED B.V., they are entitled to escalate the matter to an independent Alternative Dispute Resolution (ADR) provider. ADR services are offered to Players at no cost. All expenses associated with the ADR process are borne entirely by DOUBLED B.V. in accordance with its licensing and regulatory obligations.

4.2 ADR Decisions

Once the ADR process has concluded and a final determination has been issued by the certified ADR provider, neither the Player nor DOUBLED B.V. may reinitiate the same matter with another ADR entity. However, Players retain the right to seek legal remedies through the appropriate judicial system where the ADR decision is not legally binding under applicable private law.

4.3 Preventing Abuse

To ensure the ADR process is used appropriately, DOUBLED B.V. may, in consultation with its legal advisors, establish reasonable parameters for referrals. Such measures may include minimum claim thresholds or criteria designed to prevent misuse of ADR services. Any such conditions must remain fair, proportionate, and fully compliant with civil legislation and are subject to oversight by the Curaçao Gaming Authority.

5. Record-Keeping and Reporting Procedures

5.1 Maintenance

DOUBLED B.V. recognizes its obligation under Curaçao's regulatory framework to maintain comprehensive, accurate, and securely stored records of all Complaints submitted by Players. These records are essential for ensuring transparency, accountability, and compliance with supervisory requirements. The company's records include, but are not limited to, the following:

- Copies of all Complaint Submission Forms received, whether submitted electronically or in physical form.
- All correspondence exchanged between the Player and company representatives during the complaint resolution process.
- Internal investigation reports and any supporting documentation such as account activity logs, transaction histories, and technical evaluations where relevant.
- Documentation of referrals or escalations to an Alternative Dispute Resolution (ADR) provider and any legal proceedings initiated by either party.

All such records are retained for a minimum of five years following the final resolution of the Complaint, unless a shorter retention period is specified by applicable data protection laws, statutes of limitation, or other relevant legal provisions. The company's data retention policies are designed to remain fully compliant with Curaçao's regulatory standards and applicable privacy laws.

5.2 Regulatory Reporting

In addition to maintaining internal records, DOUBLED B.V. is required to submit detailed biannual reports to the Curaçao Gaming Authority (CGA). These reports, due on January 15th and June 15th each year, must cover all Complaints received during the preceding reporting period and include the following information:

1. The total number of Complaints submitted by Players during the reporting period.
2. A breakdown of resolved Complaints, including those upheld in favor of the Player and those rejected.
3. The number of Complaints still pending or unresolved as of the reporting date.
4. Categorization of Complaints by type, such as technical issues, payment disputes, or Responsible Gaming concerns.
5. The number of Complaints referred to ADR and the outcomes of those referrals.
6. Details of cases where Players have initiated legal proceedings against the company.

The CGA retains the authority to request access to Complaint records at any time to fulfill its supervisory duties. DOUBLED B.V. will cooperate fully with such requests, ensuring that all information is provided promptly and in the format specified by the regulator.

6. Terms and Conditions

This Complaints Policy forms an integral part of the Terms and Conditions of DOUBLED B.V. and is presented to Players in a manner that ensures clarity, visibility, and ease of access.

To achieve this, DOUBLED B.V. implements the following measures:

- The full Complaints Policy is published as a standalone document and can be accessed through a clearly visible link placed on the company's homepage, the registration page, and within the Player account dashboard.
- A summary of the complaints procedure is included in the Terms and Conditions, accompanied by direct hyperlinks leading to the complete Policy text.
- During the account registration process, Players are required to acknowledge and accept the Complaints Policy. This acknowledgment is facilitated through mechanisms such as a mandatory confirmation checkbox or a pop-up window to ensure informed consent before completing registration.

The Terms and Conditions also provide:

1. A clear explanation of how to submit a Complaint, including applicable response timelines.
2. Information on the Player's right to escalate unresolved Complaints to an independent Alternative Dispute Resolution (ADR) provider and pursue further legal remedies where applicable under the law.
3. A statement clarifying that the Curaçao Gaming Authority (CGA) does not intervene in individual disputes but may be contacted by Players regarding regulatory breaches or non-compliance by the operator.

7. Reasons for Complaints

Players of DOUBLED B.V. have the right to submit a Complaint concerning any aspect of their interaction with the company's gaming and betting services. The examples below are not exhaustive but illustrate common types of issues for which a Complaint may be raised:

- Deposit Issues – Problems such as delays, non-processing, or errors affecting the crediting of deposits to Player accounts.
- Withdrawal Issues – Disputes involving withdrawal requests, including perceived delays, rejections, or partial payments.
- Bonus Terms and Conditions – Complaints about the fairness, transparency, or application of promotional offers and bonus requirements.
- Account Closures or Restrictions – Allegations of unjustified account suspensions, closures, or imposed restrictions limiting account access or use.
- Game Fairness – Concerns about software errors, system malfunctions, or outcomes that Players perceive as unfair.
- Responsible Gaming Concerns – Issues related to the company's implementation of responsible gambling measures, such as failures to honor self-exclusion or cooling-off requests.
- KYC and Verification Procedures – Complaints regarding the process for identity verification, including perceived delays or difficulties during due diligence checks.
- Data Protection and Privacy – Matters involving the handling, processing, or safeguarding of Player personal data.
- Technical or Software Malfunctions – Problems with accessing or using the platform due to functionality issues or user interface failures.

- **Fraudulent Activities** – Allegations of fraudulent behavior, whether committed by third parties or the company itself.
- **Minors' Access** – Reports indicating that individuals under the legal gambling age have accessed the gaming services.
- **License or Regulatory Breaches** – Concerns about potential violations of licensing conditions or Curaçao regulatory requirements by DOUBLED B.V..

Players are encouraged to provide detailed information and supporting evidence when submitting a Complaint to enable a prompt and thorough investigation.

8. Governing Law and Jurisdiction

This Complaints Policy shall be governed by and interpreted in accordance with the laws of Curaçao. Any legal proceedings arising from or related to this Policy, which are not resolved through the internal complaints procedure or Alternative Dispute Resolution (ADR), shall be subject to the exclusive jurisdiction of the competent courts of Curaçao. This is without prejudice to the rights of Players to bring legal action in their country of residence where such rights are conferred under applicable local laws.

9. Contacts

Players wishing to submit a Complaint or request further information may contact DOUBLED B.V. using any of the following channels:

- **General Enquiries:** support-en@portebet.com
- **Complaints Department:** complaints@portebet.com
- **Live Chat Support:** Available 24/7 through <https://portebet.com>
- **Complaint Submission Form:** Accessible at <https://portebet.com>
- **Alternative Dispute Resolution (ADR):** Details can be found on <https://portebet.com/en>
- **Curaçao Gaming Authority:** <https://www.gamingcontrolcuracao.org>

Annex 1: Definitions

For the purposes of this Player Complaints Policy, the following terms shall carry the meanings ascribed to them below:

Player

A Player is defined as any natural person who has duly registered an account with DOUBLED B.V., completed all required identity verification and customer due diligence procedures in accordance with regulatory requirements, and engaged in one or more gaming or betting activities provided on the company's licensed platform.

Complaint

A Complaint refers to any written statement submitted by a Player expressing dissatisfaction with any aspect of DOUBLED B.V.'s services, operations, decisions, or contractual terms, and wherein the Player seeks a response, clarification, or remedial action from the company.

Dispute

A Dispute arises where a Complaint remains unresolved to the Player's satisfaction following the completion of the company's internal complaints process and has been escalated either to an independent third-party Alternative Dispute Resolution (ADR) entity or, where applicable, to a competent court of law.

Alternative Dispute Resolution (ADR)

Alternative Dispute Resolution (ADR) is defined as the impartial process conducted by an independent entity certified by the Curaçao Gaming Authority (CGA) for the purpose of reviewing and resolving unresolved Complaints between Players and DOUBLED B.V.. ADR services are provided at no cost to the Player, with all associated expenses borne entirely by the company.

Responsible Gaming Complaint

A Responsible Gaming Complaint encompasses any concern raised by a Player regarding the application, enforcement, or adequacy of responsible gambling measures. This includes, but is not limited to, the timely activation of self-exclusion or cooling-off requests and any

perceived failure to protect vulnerable individuals in alignment with the company's Responsible Gaming Policy.

Technical Issue

A Technical Issue refers to any failure, malfunction, or disruption in the software, hardware, or systems operated by DOUBLED B.V. that adversely affects a Player's ability to access or participate in gaming activities, whether through desktop, mobile applications, or other supported platforms.

Fraudulent Activity

Fraudulent Activity includes any action, inaction, or scheme intended to deceive, defraud, or obtain an unfair advantage within the context of the company's gaming services. Examples include unauthorized account access, misuse of automated tools or bots, abuse of bonuses or promotional offers, and the submission of falsified identification or verification documents.

Complaint Handler

The Complaint Handler refers to the designated personnel or team within DOUBLED B.V. responsible for the receipt, investigation, and resolution of Player Complaints in accordance with the procedures set forth in this Policy. Complaint Handlers are trained in regulatory compliance requirements and are expected to act impartially and fairly throughout the resolution process.